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92-237

**Before the**
**FEDERAL COMMUNICATIONS COMMISSION**
**Washington, D.C. 20554**



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| **In the Matter of** | ) |
| | ) |
| **Administration of the** | ) |
| **North American Numbering Plan** | ) |

**Comments of GVNW Inc./Management**

## INTRODUCTION

GVNW Inc./Management ("GVNW") hereby files the following comments in response to the Notice of Proposed Rule Making ("NPRM") in CC Docket No. 92-237, Phase One and Two, released on April 4, 1994. Phase One of the Docket addresses the selection of a new administrator for the North American Numbering Plan. Phase Two of the Docket addresses Carrier Identification Code ("CIC") expansion and interLATA presubscription. These comments submitted by GVNW will address Phase Two. GVNW agrees with the Commission that the CIC expansion is urgently needed; however, GVNW has some concerns with the implementation.

## CARRIER IDENTIFICATION CODE (CIC) EXPANSION

The Commission has requested comment on the expansion of the Feature Group D CIC from three digits to four digits. Currently, the CICs are used in the equal access environment to access interexchange carriers under presubscription or dial around using the 10XXX Carrier Access Code ("CAC") where XXX is the CIC. GVNW observes that local exchange carrier's ("LEC") switching equipment must be equipped with equal access software and the LEC must be presently providing equal

access in order for the CIC expansion to be a contemporaneous issue, since non-equal access LECs do not use CICs and CACs.

The Commission has noted that a "broad industry consensus" feels that most of the work, such as switch replacement, has been accomplished. NPRM, para. 49. GVNW does not agree with the industry consensus in the case of small local exchange carriers. While LECs such as US West, NYNEX, Pacific Telesis, etc., usually follow a schedule of updating switching features every several years, the same pattern is not true for smaller LECs. These smaller LECs are typically equipped with central offices ranging from 30 access lines to 10,000 access lines.

The four digit CIC expansion could impose significant expenditures upon some smaller local exchange carriers due to a requirement to update switching equipment for the CIC expansion. In some cases, the cost of upgrading software exceeds the cost of a switch replacement. In other cases, the manufacturer of the given equipment no longer supports software enhancements. In both of the previous examples, the only way the affected LEC could accommodate a four digit CIC would be to replace the existing switching equipment.

As an example, a Northern Telecom DMS 10 switch with Series 300 software would need to be upgraded to Series 405.20 software in order to accommodate CIC expansion. Siemens-Stromberg DCO switches require a release 17.3 or higher in order to process a four digit CIC code. In both cases, the software updates could cost between $150,000 and $200,000. An Alcatel E10-Five switch cannot be upgraded for CIC expansion or any other new feature sets at the current time.

The Commission should be aware that the options available to small local

exchange carriers are limited. Unlike larger LECs, small LECs do not always keep current with software feature changes because of a lack of demand for new services offered in software updates. Consequently, switches generally do not possess the most recent software updates. Many manufactures charge a LEC for each level of software update, thereby causing the LEC to incur major expenses for the CIC expansion without providing any other needed enhancement.

As an alternative, a LEC could avoid incurring the untimely expense of software feature improvements for the CIC expansion alone by offering new services co-incident with market demand that would require updated software. This alternative is only viable for LECs experiencing demand for such services. If a LEC does not upgrade, the LEC will not be able to process new CICs using the expanded format. Consequently, carriers with the expanded CIC will not receive access from users dialing the expanded code.

Software updates for CIC expansion have only recently been available for smaller switches. The Siemens-Stromberg DCO offered CIC expansion in July of 1992. The Northern Telecom DMS 10 CIC expansion software was available in December of 1992 . Typically, small LECs wait to upgrade switching software until industry requirements and the market dictate the need. If, in 1995, small LECs are required to upgrade software only for the CIC expansion, there may be a significant amount of investment that will be displaced without significant benefit to the IXCs or end users.

The Commission has tentatively found:

> ...."that lengthening the transition period [CIC expansion period] will significantly reduce....even to the point of virtually eliminating ... the hardships imposed on pay phone providers, manufacturers, and PBX users. A longer transition or permissive dialing period will mean that less existing equipment would be needed to be retired prematurely. Accordingly, we propose to specify a transition period of six years and we seek comment on this proposal." NPRM, para. 54.

Since no mention was made of the hardships imposed on smaller LECs due to the limitations of small central office switching equipment, it would appear that the Commission may not have considered the operation of smaller local exchange carriers (LECs) as opposed to the operation of Regional Bell Operating Companies ("RBOCS") and larger holding companies. See NPRM, para. 52 ("LECs generally support the shortest possible transition period."); Id., at n. 81 (citing comments of GTE, NYNEX, Pacific Bell and SW Bell).

***The existing architecture of certain small LEC switches will not accommodate permissive dialing.*** Permissive dialing, as we understand the term, is the ability to accept and or translate (route) on the basis of both three and four digit CICs. Some small tandem switches currently, by design, accept **either** a three **or** four digit CIC code from a subtending end office, but not both.

Permissive dialing would require a LEC switch to accept and route both three **and** four digit CICs. As mentioned previously, many small end office switches and

tandem switches are incapable of permissive dialing. Untimely upgrades or replacement of small switches may be required if permissive dialing is required universally. In order to ensure equitable treatment and to avoid stranded investment, GVNW recommends the following:

1. Allow permissive dialing for a six year period for subscribers and LECs, with the Commission acknowledging that the four digit CIC will not be ubiquitous or routable in all LEC switches.

2. Allow relief from compliance to four digit CIC processing for LECs who can demonstrate that converting to an expanded CIC would not be economically practical. This relief should stay in effect until such time that software upgrades are required for other purposes or until switch replacement, which ever occurs first.

Attached to these comments as Attachment A is a summary of various LEC end offices listing the switch manufacturer, software level, and current capabilities to accommodate CIC expansion.

## INTERSTATE, INTRALATA TOLL CALLS

In CC Docket 92-237, the Commission has sought comment on whether the Commission should require LECs to cease screening and completing interstate intraLATA "1+" MTS calls and instead deliver those calls to the carrier preselected by the end user, unless the primary routing numbers indicate otherwise. NPRM, para. 58.

GVNW recommends that the Commission separate the issue of interstate

intraLATA presubscription from the instant issue of CIC administration and expansion. GVNW further believes that the issue of interstate intraLATA presubscription should be addressed in a separate Commission proceeding.

GVNW offers the following reasons for recommending the separation of the issues:

1. Interstate intraLATA presubscription has no relationship to CIC administration.

2. For most small LECs (and, we believe, for many large LECs) the current switching software only accommodates the identification of one presubscribed carrier for all interLATA and international traffic. In these cases, all intraLATA traffic is defaulted to the LEC for provision of that service. For LECs with these configurations, the imposition of a separate PIC requirement for interstate intraLATA service would trigger the need for switch upgrades or replacements at a substantial cost. The Commission should weigh these costs carefully in addressing this issue.

3. Some recently developed switching architecture (software) allows for three carrier choices. The software has been developed to provide carrier selections for international, interLATA, and intraLATA. Generally, the international carrier designation is hard coded, but the interLATA and intraLATA choices are table driven, and may have flexibility in some cases. However, in general terms, the switch design contemplates that the intraLATA designation will apply to **all** intraLATA traffic, both interstate, (which the Commission recognizes is generally a small volume) and state (which is usually a large amount of traffic). This issue

should be dealt with in another docket, so that the impacts on state intraLATA traffic can be fully explored.

4. Finally, this issue should be moved to a separate docket so that the inputs of this proposal on LECs can be more fully evaluated in relationship to the MFJ requirements. These requirements, coupled with the more prevalent switching technology outlined in 2., above, could lead to LECs being precluded from providing any intraLATA traffic.

Respectfully submitted,

Robert C. Schoonmaker (COC)

Robert C. Schoonmaker

GVNW Inc./Management
P.O. Box 25969
Colorado Springs, CO 80936

(719) 594-5800
(FAX) 599-0968

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The following is a summary by state of the Local Exchange Carrier Switches by exchange, switch manufacturer, level of software, and whether the switch is capable of Carrier Identification Code (CIC) expansion.

| STATE | EXCHANGE | SWITCH MANUF. | SOFTWARE LEVEL | FOUR DIGIT CIC CAPABLE |
|---|---|---|---|---|
| **Alaska** | Anaktuvik Pass | Redcom | V14.0B | YES |
| | Aniak | Redcom | V12.2B-10K | NO |
| | Anvik | Redcom | V12.2B | NO |
| | Atquasuk | Redcom | V7.0A | NO |
| | Cold Bay | Redcom | V11.0C | NO |
| | Cooper Landing | Redcom | V11.0C | NO |
| | Crooked Creek | Redcom | V12.2B | NO |
| | Fort Yukon | Redcom | V11.0C | NO |
| | Galena | Redcom | V11.0G | NO |
| | Grayling | Redcom | V12.2B | NO |
| | Holy Cross | Redcom | V12.2B | NO |
| | Iliamna | Redcom | V12.0B | NO |
| | Kaktovik | Redcom | V7.0A | NO |
| | Kalskag | Redcom | V12.2B | NO |
| | King Cove | Redcom | V12.2B | NO |
| | Mentasta | Redcom | V3.1 | NO |
| | Nuiqsut | Redcom | V7.0A | NO |
| | Point Hope | Redcom | V12.2B | NO |
| | Point Lay | Redcom | V7.0A | NO |
| | Port Lions | Redcom | V12.0B | NO |
| | Red Devil | Redcom | V12.2B | NO |
| | Sandpoint | Redcom | V12.2B-10K | NO |
| | Shageluk | Redcom | V12.2B | NO |
| | Sleetmute | Redcom | V12.2B | NO |
| | Stoney River | Redcom | V12.2B | NO |
| | Wainwright | Redcom | V14.0B | YES |
| **Arizona** | Cascabel | Redcom | 12.2 | NO |
| **California** | ETNA | DMS-10 | 406.1 | YES |
| | Fort Jones | DMS-10 | 406.1 | YES |
| | Hamburg | DMS-10 | 403.21 | NO |
| | Happy Camp | DMS-10 | 403.21 | NO |
| | Oak Knoll | DMS-10 | 403.21 | NO |
| | Sawyers Bar | DMS_10 RLSM | 403.21 | NO |
| | Somes Bar | DMS-10 | 403.21 | NO |

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| STATE | EXCHANGE | SWITCH MANUF. | SOFTWARE LEVEL | FOUR DIGIT CIC CAPABLE |
|---|---|---|---|---|
| **Colorado** | Beulah | DMS-10 | 403.31 | NO |
| | Colo. City | Stromberg | 9.01 | NO |
| | Kim | Redcom | 12.0 | NO |
| | Peetz | Stromberg | 16.0 | NO |
| | Roggen | DMS-10 | 405.21 | NO |
| | Rye | Stromberg | 9.01 | NO |
| | Willard | Redcom | 6.0 | NO |
| **Idaho** | Arbon | Stromberg | 17.3 | NO |
| | Lakeview | Redcom | 11.00 | NO |
| | Midvale | DMS-10 | 302.70 | NO |
| | Potlatch | DMS-10 | 402.53 | NO |
| | Powell | Redcom | V6.0J | NO |
| | Rockland | Stromberg | 17.3 | NO |
| | Troy | DMS-10 | 208.33 | NO |
| Illinois | Baldwin | DMS-10 | 403.31 | NO |
| | Blair | DMS-10 | 403.31 | NO |
| | Columbia | GTD5-EAX | 1641 | NO |
| | Dupo | GTD5-EAX | 1641 | NO |
| | El Paso | Stromberg | 17.2 | NO |
| | Glenn | DMS-10 | 403.31 | NO |
| | Golden | Stromberg | 17.3 | NO |
| | Mendon | ITS Vidar | 7.1.3 | NO |
| | Moultrie | DMS-10 | 406.10 | YES |
| | Prairie dR | GTD5-EAX | 1641 | NO |
| | Red Bud | GTD5-EAX | 1641 | NO |
| | Renault | GTD5-EAX | 1641 | NO |
| | Rice | DMS-10 | 403.31 | NO |
| | St. Libory | DMS-10 | 403.31 | NO |
| | Valmeyer | GTD5-EAX | 1641 | NO |
| | Venedy | DMS-10 | 403.31 | NO |
| | Waterloo | GTD5-EAX | 1641 | NO |

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| STATE | EXCHANGE | SWITCH MANUF. | SOFTWARE LEVEL | FOUR DIGIT CIC CAPABLE |
|---|---|---|---|---|
| Missouri | Auxvasse | DMS-10 | 406.10 | YES |
| | Bigspring | DMS-10 | 406.10 | YES |
| | Hatton | DMS-10 | 406.10 | YES |
| | Higginsvll | GTD-5 | 1641 | NO |
| | Mokane | DMS-10 | 406.10 | YES |
| | Rhineland | DMS-10 | 406.10 | YES |
| | Tibbets | DMS-10 | 406.10 | YES |
| Montana | Ashland | DMS-10 | 403.31 | NO |
| | Broadus | DMS-10 | 403.31 | NO |
| | Forsyth | DMS-10 | 403.31 | NO |
| | Havre | DMS-10 | 406.10 | YES |
| | Hysham | DMS-10 | 402.52 | NO |
| | Eureka Rural | S-C DCO | 14.10 | NO |
| | Lame Deer | DMS-10 | 403.31 | NO |
| | Lincoln | DMS-10 | 406.10 | YES |
| | So. Alberton | Redcom | V6.0G | NO |
| | Wisdom | DMS-10 | 405.10 | NO |
| Nebraska | Hoskins | DMS-10 | 404.40 | NO |
| | Pierce | DMS-10 | 404.40 | NO |
| New Mexico | Des Moines | DMS-10 | 210.40 | NO |
| | Maxwell | DMS-10 | 302.62 | NO |
| Nevada | Fallon | S-C | 18.00 | YES |
| | Lake Valley | Redcom | V6.1A | NO |
| | Lincoln | DMS-10 | 406.10 | YES |
| | Pioche | Redcom | V6.1A | NO |
| N. Dakota | Beulah | Stromberg | 18.00 | YES |
| | Center | Stromberg | 18.00 | YES |
| | Fort Yates | Stromberg | 18.00 | YES |
| | Gldn Valley | Stromberg | 18.00 | YES |
| | Hazen | Stromberg | 18.00 | YES |
| | Mercer | Stromberg | 18.00 | YES |
| | Pick City | Stromberg | 18.00 | YES |
| | Selfridge | Stromberg | 18.00 | YES |
| | Solen | Stromberg | 18.00 | YES |
| | St. Anthony | Stromberg | 18.00 | YES |
| | Stanton | Stromberg | 18.00 | YES |
| | Turtle Lake | Stromberg | 18.00 | YES |
| | Washburn | Stromberg | 18.00 | YES |
| | Zap | Stromberg | 18.00 | YES |
| S. Dakota | McLaughlin | Stromberg | 18.0 | YES |

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| STATE | EXCHANGE | SWITCH MANUF. | SOFTWARE LEVEL | FOUR DIGIT CIC CAPABLE |
|---|---|---|---|---|
| **Oregon** | Canby | S-C | 17.30 | YES |
| | Condon | S-C | 15.10 | NO |
| | Dufur | DMS-10M | 305.10 | NO |
| | Gervais | DMS-10M | 302.50 | NO |
| | Harper | DMS-10 | 301.41 | NO |
| | Juntura | DMS-10 | 301.41 | NO |
| | Mt. Angel | DMS-10 | 406.10 | YES |
| | Mt. Vernon | DMS-10 | 403.31 | NO |
| | Molalla | DMS-10 | 406.10 | YES |
| | Monitor | S-C | 17.30 | YES |
| | Monroe | S-C | 18.00 | YES |
| | Peoples/Lyons | DMS-10 | 405.20 | NO |
| | Pine | DMS-10 | 406.10 | YES |
| | Pioneer (RNS) | S-C | RLS 18 | YES |
| | Roome | Alcatel | R6.1 BFA3 | NO |
| | Stayton | DMS-100/200 | BCS 35 | NO |
| | St. Paul | S-C | 17.30 | YES |
| **Utah** | Apple Vlly | DMS1 | 405.10 | NO |
| | Antimony | DMS-10 RLCM | 403.30 | NO |
| | Beryl | DMS-10 | 405.10 | NO |
| | Bicknell | ITEC | SXS | NO |
| | Boulder | DMS-10 RLCM | 403.13 | NO |
| | Bryce Canyon | ITEC | SXS | NO |
| | Castle Dale | Stromberg | 17.20 | NO |
| | Cannonville | DMS-10 | 403.13 | NO |
| | Cleveland | Stromberg | 17.20 | NO |
| | Colorado Cty | DMS-10 | 405.10 | NO |
| | Duck Creek | DMS-10 RLCM | 405.10 | NO |
| | Emery | Stromberg | 17.20 | NO |
| | Escalante | DMS-10 | 403.13 | NO |
| | Ferron | Stromberg | 17.20 | NO |
| | Green River | Stromberg | 17.20 | NO |
| | Hatch | ITEC | SXS | NO |
| | Huntington | Stromberg | 17.20 | NO |
| | Koosharem | DMS-10 | 403.31 | NO |
| | Loa | ITEC | SXS | NO |
| | Mammoth Ck | DMS1 | 405.10 | NO |
| | Manti | DMS-10 | 403.21 | NO |
| | McDonald Lk | DMS1 | 405.10 | NO |
| | Orderville | DMS-10 | 405.10 | NO |
| | Panquitch | DMS-10 | 403.13 | NO |
| | Swain's Ck | DMS1 | 405.10 | NO |

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| STATE | EXCHANGE | SWITCH MANUF. | SOFTWARE LEVEL | FOUR DIGIT CIC CAPABLE |
|---|---|---|---|---|
| Washington | Ellensburg | DMS-100/200 | BCS-35 | NO |
| | Grays River | GTD5EAX | SVR1621 | NO |
| W. Virginia | Lost River | Alcatel E10-5 | R06.1B.FA3 | NO |
| Wyoming | S.E. Sheridan | DMS-10 | 403.31 | NO |
| | Sundance | DMS-10 | 402.53 | NO |